



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed
18-Unit Apartment Building Located at 1755 N. Canyon Drive in the Hollywood Area
of the City of Los Angeles (ENV-2015-623-MND)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

The Lead Agency proposes to construct a four-story, 18-unit apartment with subterranean parking for 20-vehicles that will require approximately 2,700 cubic yards of soil export activity from a lot approximately 0.19-acres in size. The proposed project is less than 50 feet east of the SR-101 Freeway,¹ which has an average daily traffic volume of approximately 220,000 vehicles including approximately 8,888 diesel trucks.² Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)³ to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic. The SCAMD staff notes that the Draft MND includes mitigation under the Land Use Section X(b) requiring MERV 13 air filtration, double-paned windows, etc., but there is no discussion of how this mitigation impacts the potential project adverse air quality and health affect impacts from the freeway.

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, the California Air Resources Board recommended in 2005 avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.⁴ Since the time of that study, additional research has continued to build the case

¹ DMND: Environmental Settings, Page 4 and an Aerial map inspection.

² 2014 Traffic Volumes - http://www.dot.ca.gov/hq/traffops/census/docs/2014_aadt_volumes.pdf SR-101 at Sunset/Hollywood Blvds; and 2013 Truck Traffic, Page 118, Truck Traffic, Los Angeles Jct. Rte 2, 4.04 % Trucks (0.404 x 220,000 = 8,888 trucks): http://www.dot.ca.gov/hq/traffops/census/docs/2013_aadt_truck.pdf

³ "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis"

Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

⁴ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective."

Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

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that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.⁵

While the health science behind recommendations against placing new homes close to freeways is clear, SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sound walls, vegetation barriers, etc. However, because of the potential health risks involved it is critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

Limits to Enhanced Filtration Units

The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters⁶ similar to those proposed for this project, costs were expected to range from \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gasses from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

Documentation

The Air Quality section on page 20 alludes to surrogate air studies for comparable land use projects. In order to demonstrate the Lead Agency's significance determinations for the proposed project's short- and long-term air quality impacts for localized and regional air quality, the Lead Agency should document these findings by including the outputs from the CalEEMod modeling in the Final MND. Otherwise, the Lead Agency has not provided substantial evidence to demonstrate its findings that project impacts are less than significant.

⁵ See Chapter 9 of the 2012 AQMP for further information

Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

⁶ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters.

Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0> .

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The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist at (909) 396-3302, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

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